

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT MASSACHUSETTS

MARK M. THORNTON,  
Plaintiff

V.

NORTHEAST BUILDERS TRANSPORT, INC.  
And BARRY N. EHRSTEIN,  
Defendants

CIVIL ACTION No. 03-12521-RGS

**DISCLOSURE OF MEDICAL INFORMATION IN PERSONAL INJURY CASE  
PURSUANT TO LOCAL RULE 35.1(A)**

(1) The plaintiff provides the following itemization of medical expenses:

Somerville Fire Department Ambulance 93 Highland Avenue Somerville, Massachusetts 02143 617-623-1700	\$	609.00	01/22/01
Massachusetts General Hospital P.O. Box 9693 Boston, Massachusetts 02114-4693 617-726-2159	\$	5795.40	01/22/01
MGM Physicians Organization, Inc. ER Doctor, Radiology, EKG	\$	1022.22	01/22/01
Dr. Heaps/Dr. Price/Dr. Goumas Four Seasons Orthopedics 505 West Hollis Street Nashua, New Hampshire 03062 603-883-0091	\$	2622.00	01/29/01 - 12/24/01
So. NH Medical Center 8 Prospect Street Nashua, New Hampshire 03060 603-577-2000	\$	6648.00	01/29/01 - 03/24/01
Dr. Lesser and Dr. House 24 Dearborn Street Nashua, New Hampshire 03060 603-886-0660	\$	966.00	05/18/01

Dr. Peter S. Hacker 30 Dearborn Street Nashua, New Hampshire 03060 603-883-2226	\$	599.00	02/01/01 - 09/17/01
Occupational Health Center of Waltham	\$	2231.00	06/20/01 - 08/15/01
Dr. Glenn Philo, DC 76 Northeastern Boulevard #32A Nashua, New Hampshire 03062 603-889-0550	\$	1265.00	04/27/01 - 08/14/01
Nashua Anesthesia Partners 8 Prospect Street Nashua, New Hampshire 03060 603-889-2624	\$	420.00	01/29/01
Associated Radiologists 8 East Pearl Street Nashua, New Hampshire 03060 603-883-4636	\$	569.00	01/27/01 - 05/24/01
Elliot Hospital One Elliot Way Manchester, New Hampshire 03103 603-669-5300	\$	1032.60	10/23/01
HealthSouth Sports Medicine 505 West Hollis Street Nashua, New Hampshire 03062 603-886-2710	\$	9847.00	02/22/01 - 02/15/02
Dr. Steven Rudman 225 Bridge Street Manchester, New Hampshire 03104 603-668-3509	\$	1381.00	10/12/01 - 07/15/02
New England Baptist Hospital 125 Parker Hill Avenue Boston, Massachusetts 02120	\$	578.00	04/25/02
Dr. James Rainville The Spine Center of NE Baptist 125 Parker Hill Avenue Boston, Massachusetts 02120	\$	2113.00	06/15/01 - 09/04/01
Joyce Santostephano, Speech Therapist Catholic Medical Center	\$	262.00	08/08/01 - 08/13/01

769 Main Street  
 Manchester, New Hampshire 03102  
 603-641-6700

Joan Scanlon, Ph.D.	\$	2120.00	05/11/01 -
19 Tyler Street, Suite 303			03/17/03
Nashua, New Hampshire 03060			
603-881-7753			

Dr. Richard W. Cullen	\$	1750.00	11/25/02 -
300 Chestnut Street Suite 500			01/04/04
Needham, Massachusetts 02492			
781-444-7137			

Dr. Marc Sadowsky	\$	595.00	09/30/03 -
New England Neurological Associates			01/09/04
220 Sutton Street			
North Andover, Massachusetts 01845			
978-687-2321			

Michelle McClellan	\$	1716.00	10/06/03 -
Orthopedic Physical Therapy Associates, Inc.			02/10/04
159 Main Dunstable Road, Suite 101			
Nashua, New Hampshire 03060			
603-881-5554			

Dr. David R. Kosofsky	\$		
Nashua Podiatry Associates			
166 Kinsley Street			
Nashua, New Hampshire 03060			
603-880-9177			


TOTAL        \$    44,141.22

The plaintiff reasonably expects to incur additional medical expenses.

(2) Pursuant to Local Rule 35.1(A)(2)(b) the plaintiff identifies the above-named health care providers at those from whom or which the plaintiff has received diagnosis, care or treatment of injuries for which recovery is sought. The plaintiff shall provide a signed statement from the plaintiff authorizing the defendant's counsel access to all the plaintiff's medical records from these and all other providers. The plaintiff's counsel states that given the recently enacted HIPAA law, each medical provider has its own particular medical authorization. The Plaintiff resides in close proximity to his counsel's office, and will return any signed medical authorization within two (2) business days of receipt of the same.

Dated: March 19, 2004

Respectfully submitted,  
MARK M. THORNTON  
By his attorney,

A handwritten signature in black ink, appearing to read "William H. Barry III", written over a horizontal line.

William H. Barry III  
Massachusetts BBO#545547  
Barry Law Office  
255 Main Street  
Nashua, New Hampshire 03060  
603-883-0474


C:\1118Thornton\disclosure of medical information.wpd

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has this date been forwarded to all parties the document by first-class mail, postage prepaid, as follows:

Michael B. Weinberg, Esquire  
John A. Donovan, Jr., Esquire  
Donovan Hatem LLP  
Two Seaport Lane  
Boston, Massachusetts 02210

Date: March 19, 2004

  
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William H. Barry III